

BILL CASSIDY, M.D.  
LOUISIANA

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COMMITTEES:

APPROPRIATIONS

ENERGY AND NATURAL  
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HEALTH, EDUCATION, LABOR,  
AND PENSIONS

VETERANS' AFFAIRS

JOINT ECONOMIC COMMITTEE

# United States Senate

May 2, 2016

The Honorable Laura Vaught  
Associate Administrator for Congressional and Intergovernmental Relations  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Room 3426 ARN  
Washington, DC [REDACTED]

Dear Admin. Vaught:

I am writing on behalf of (b) (6) concerning an issue involving the EPA, Region 6. I have enclosed all of the relevant documents I have received for your review.

(b) (6) recently wrote to Regional Administrator Ron Curry outlining (b) concerns regarding air emissions by Wood Resources, LLC in Harahan, Louisiana. (b) contends that Wood Resources has exceeded the limits required to obtain an air quality permit. (b) is requesting that Region 6 conduct air quality particulate testing in the area.

Thank you in advance for your assistance in this matter. If you have any questions or comments, please contact Michael Eby in my Baton Rouge Office at (225) 929-7711.

Sincerely,

*B. J. Cassidy, M.D.*

Bill Cassidy, M.D.  
United States Senator

BC\ME

Encl.

—

April 29, 2016

The Honorable Ron Curry  
Regional Administrator, Region 6  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202

(via email [curry.ron@epa.gov](mailto:curry.ron@epa.gov) and U.S. mail)

RE: Request for air quality testing in Harahan, Louisiana for particulate matter being generated by Wood Resources LLC from sand dredging and stockpiles, concrete crushing, limestone and aggregate stockpiles, and compost processing.

Dear Mr. Curry:

We request the EPA conduct air quality (particulate) testing in our residential community.

Wood Resources LLC has a facility at 6148 River Rd, Harahan, LA 70123 on the Mississippi River batture (the river bank between the levee and the water). At this facility, Wood Resources has at least four operations: (1) sand dredging and stockpiles, (2) concrete crushing, (3) limestone and aggregate stockpiles, and (4) composting of manure, stable refuse, woodwaste and food stuffs. See photos attached showing facility location adjacent to residential community including schools and churches.

During 2015, Wood Resources received 914,073 cubic yards of dredged sand from its affiliate Wood Materials according to official reports filed with the Louisiana Department of Wildlife and Fisheries (copies attached). Wood Resources emissions from its sand stockpile activity are largely uncontrolled--stockpiles are not watered, trucks often are not covered, haul roads are not kept watered, and sand is not promptly removed from paved roads. Visible sand storms invading the adjoining residential community are common.

A particulate emission factor for uncontrolled sand or aggregate stockpile operations is 0.33 pound of emissions per ton of material handled.<sup>1</sup> Applying that emission factor, Wood

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<sup>1</sup> The South Coast Air Quality Management District, the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties, published emission factors for aggregate processes. See Particulate Matter (PM) Emission Factors for Processes/Equipment at Asphalt, Cement, Concrete, and Aggregate Plants (Dec. 2014) (<http://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/particulate-matter-emission-factors-for-processes-equipment-at-asphalt-cement-concrete-and-aggregate-product-plants.pdf?sfvrsn=10>). The South Coast Air Quality Management District recommended that facilities calculate emissions from an open storage stockpile of aggregate material by multiplying the annual tonnage of stored material by an emission factor of 0.33 for uncontrolled emissions.

See also, the U.S. EPA's most recent emission factor data for the sand and gravel industry set out in Emission Factor Documentation for AP-42, Section 11.19.1, Sand and Gravel Processing, Final Report (April 1995) (<https://www3.epa.gov/ttnchie1/ap42/ch11/bgdocs/b11s19-1.pdf>). The EPA reported factors for emissions from a combination of storage pile wind erosion, material handling, and vehicle traffic are set out in Table 4-1 at page 4-6

The Honorable Ron Curry  
Regional Administrator, Region 6  
U.S. Environmental Protection Agency

page 2

Resources is estimated to have annual particulate emissions of 181 tons based on its 2015 receipt of 914,073 cubic yards of sand.

$$\begin{aligned} 914,073 \text{ cu. yds.} &\times 1.2 \text{ ton/cu. yd.} \times 0.33 \text{ lb. emissions/ton of material handled} \div 2000 \text{ lbs./ton} \\ &= 180.99 \text{ tons of emissions} \end{aligned}$$

Additional emissions are caused by its concrete crushing operations, limestone stockpiles, and composting operations.

Despite having estimated annual releases of greater than 180 tons of particulate matter, a regulated air pollutant, Wood Resources has never applied for a Louisiana Department of Environmental Quality air permit.

Wood Resources receives its sand by dredging from the bottom of the Mississippi River. There is concern that the dredged sand contains heavy metals and other harmful components deposited into the River by upstream industries.

The community also has concerns about the particulate sizes. We know that OSHA recently recognized silica as a carcinogenic and issued a rule concerning workforce exposure to silica (sand). The dangerous silica is the smaller particles, so therefore, we are concerned about the particle size of blown sand. Sand particles get ground to a smaller size by truck traffic in the pits and haul roads, and by the compression weight of high sand piles. The sand pits across from our homes are as much as 27 feet from top to bottom when full.

Much of this sand is now being delivered to the Louis Armstrong New Orleans International Airport for fill material for the new North Terminal buildings--a federally funded project. This is a matter of federal concern.

**Requested Action:**

We request the assistance of the EPA to measure the (1) quantity, (2) components, and (3) particle size of the blowing sand or particulate matter invading our community. To be meaningful, the testing of the blown sand needs to be done when we have not had rain for several days and the surface sand is dry. Also, it should be on a day or days when the wind is from the southeast, and at locations along Riverside Drive adjacent to the levee.

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of its Report, but declined to publish an emission factor for a stockpile *only*. However, the EPA published emission factor for a combination of storage pile wind erosion, material handling, and vehicle traffic is relevant to Wood Resources sand operations.

The Honorable Ron Curry  
Regional Administrator, Region 6  
U.S. Environmental Protection Agency

page 3

We thank you for your time and assistance. If you need any additional information, please contact us immediately.

Sincerely,

(b) (6)

(b) (6)

(b) (6)

(b) (6)

c: The Honorable David Vitter, U.S. Senator (David\_Vitter@Vitter.Senate.gov)  
The Honorable Bill Cassidy, M.D., U.S. Senator (Bill\_Cassidy@Cassidy.Senate.gov)  
The Honorable Steve Scalise, U.S. Representative (Charles.Henry@mail.house.gov)  
The Honorable Chuck Carr Brown, Ph. D., Secretary, Louisiana Dept. of Environmental Quality (DEQ-WWWOfficeoftheSecretaryContact@la.gov)  
The Honorable Tina Miceli, Mayor, City of Harahan (Tina.Miceli@ci.harahan.la.us)  
The Honorable Council Members, City of Harahan

attachments:

- 1) Photos showing location of sand pits, concrete crushing plant, aggregate stockpiles, and composting operation in vicinity of Harahan residential community.
- 2) Official reports filed with Louisiana Department of Wildlife and Fisheries showing 2015 receipt of 914,073 cubic yards of sand.



Photo showing location of sand pits, concrete cr

Red areas are sand pits.

Yellow area is a sand pit now being used for a c  
Blue area is a concrete crushing operation and I

## **Attachment 2**

### **Official reports filed with Louisiana Department of Wildlife and Fisheries showing 2015 receipt of 914,073 cubic yards of sand**

<b>Report Date</b>	<b>Report Month</b>	<b>Dredge</b>	<b>Dredge</b>	<b>Pit</b>	<b>Quantity (Cubic Yards)</b>
		Start Date	End Date		
3/12/2015	Feb. 2015	2/9/2015	3/3/2015	3	204,857
8/3/2015	Aug. 2015	7/17/2015	8/21/2015	2	83,932
9/15/2015	Sep. 2015	8/24/2015	9/9/2015	4	145,308
10/22/2015	Sep. 2015	9/4/2015	10/10/2015	3	245,574
10/29/2015	Oct. 2015	10/9/2015	10/26/2015	4	83,783
11/30/2015	Oct. 2015	10/21/2015	11/3/2015	7	59,550
11/30/2015	Nov. 2015	11/3/2015	11/16/2015	2	91,069
<b>TOTAL 2015</b>					<b>914,073</b>

**Louisiana Department of Wildlife and Fisheries**  
2021 Lakeshore Drive, Suite 210  
New Orleans, LA 70122  
Attention: File Formata  
Fax #: 504-284-5270

**THIS REPORT MUST BE FILED ON OR BEFORE THE 15<sup>TH</sup> OF THE MONTH  
(EVEN IF NO DREDGING ACTIVITY HAS TAKEN PLACE)**

For use by sand, gravel, or fill material dealers

MONTHLY REPORT FOR February 15  
Wood Materials Sec

LEADERSHIP IN THE CHURCH

Material Removed	Permit Number	Date (From, To)	P/L Location and name	Total Cubic yds	Royalty Rate	Royalty Due	Penalty 1 LR & Mag	Total Due
Brick	WCF 20150	3/1/15 3/3/15	Dit 3, Eastbank 201,857	.79	39,488.53	—	5448.53	45,000.00
	24015		Dit 3, Eastbank 225,000	.29	65,200.00	—	5760.00	65,760.00

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08/12/2014 16:04 5844351878

Call this an initial  
to next project

## Certification

I declare under the penalty for perjury that the information contained in this document is true, correct and complete.

Name and Title  
Stacy Thompson

Signature  
Stacy Thompson

Telephone Number 619-443-0165

3/12/15

#### Name and Title

Stacy Tomberly

**Louisiana Department of Wildlife and Fisheries**  
2021 Lakeshore Drive, Suite 210  
New Orleans, LA 70122  
Attention: Fish Permits  
Fax # 504-284-5270

**THIS REPORT MUST BE FILED ON OR BEFORE THE 15<sup>th</sup> OF THE MONTH  
(EVEN IF NO DREDGING ACTIVITY HAS TAKEN PLACE)**

For HSC by sand, gravel or full material dealers

MONTHLY REPORT FOR July

Wolfgang Amadeus Mozart

### **Reporting company name**

## Certification

I declare under the penalty for filing false returns that this monthly report has been examined by me and is to the best of my knowledge and belief, true, correct and complete.

Name and Title Stacy Thompson Sales Telephone Number (614) 350-1234  
Signature Stacy Thompson Date 8/13/15

**Louisiana Department of Wildlife and Fisheries**  
2021 Lakeshore Drive, Suite 210  
New Orleans, LA 70112  
Attention: Fish Permits  
Fax #: 504-284-5470

**THIS REPORT MUST BE FILED ON OR BEFORE THE 15<sup>th</sup> OF THE MONTH  
(EVEN IF NO DREDGING ACTIVITY HAS TAKEN PLACE)**

For use by school, church or family material dealers

MONTHLY REPORT FOR September 15 20

Wood materials LLC

Reporting company name

Certification

I declare under the penalty for filing false returns that this monthly report has been examined by me and is to the best of my knowledge and belief true, correct and complete.

Name and Title Stacy Trumbey Sales Telephone Number (314) 430-1234  
Signature Stacy Trumbey Date 9/15/15

**Louisiana Department of Wildlife and Fisheries**  
2021 Lakeshore Drive, Suite 210  
New Orleans, LA 70122  
**Attention: Fish Permits**  
Fax # 504-284-5211

**THIS REPORT MUST BE FILED ON OR BEFORE THE 15<sup>TH</sup> OF THE MONTH  
(EVEN IF NO DREDGING ACTIVITY HAS TAKEN PLACE)**

For use by sand, gravel or fill material dealers

MONTHLY REPORT FOR September 2015  
Wood Materials LLC  
Reporting company name

Reporting company name

Certification

I declare under the penalty for filing false returns that this monthly report has been examined by me and is to the best of my knowledge and belief, true, correct and complete.

Name and Title Stacy Trumbo Telephone Number (54) 4311234  
Signature Stacy Trumbo Date 10/22/15

Louisiana Department of Wildlife and Fisheries  
2021 Lakeshore Drive, Suite 211  
New Orleans, LA 70122

Attention: Fill Permits  
Fax #: 504-284-5271

THIS REPORT MUST BE FILED ON OR BEFORE THE 15<sup>TH</sup> OF THE MONTH  
(EVEN IF NO DREDGING ACTIVITY HAS TAKEN PLACE)

For use by sending library or the member institution

MONTHLY REPORT FOR OCTOBER

Wood materials 112

Reporting company name

## Certification

I declare under the penalty for perjury that this tractory report has been examined by me and is to the best of my knowledge and belief, true, correct and complete.

Name and Title: Stacy Tronbley  
Signature: 

**Louisiana Department of Wildlife and Fisheries**  
2000 Quail Drive, Suite 430  
Baton Rouge, LA 70808  
Attention: Sheila Roman  
Fax: (225) 765-2625

This report must be filed on or before the 15<sup>th</sup> of the month.

For use by sand, gravel or all material dealers

MONTHLY REPORT FOR OCTOBER 2015

11 Local Mathematics CEC

Revolving community planning

Certification

I declare under the penalty for filing false returns that this monthly report has been examined by me and is to the best of my knowledge and belief true, correct and complete.

Stacy Trumbler Telephone Number (204) 436-1234

Name and Title

Signature Stacy Tomblay

Louisiana Department of Wildlife and Fisheries  
2000 Quail Drive, Suite 430  
Baton Rouge, LA 70808  
Attention: Shelia Roman  
Fax: (225) 735-2625

This report must be filed on or before the 15<sup>th</sup> of the month.

For use by sand, gravel or fill material dealers

## MONTHLY REPORT FOR November

Wood Materials 463

Recent company names

Certification

I declare under the penalty for filing false returns that this monthly report has been examined by me and is to the best of my knowledge and belief true and correct.

Telephone Number 436-1234  
Street Stacy Treadley  
City and State, town, correct and complete.

Signature: Alicy J. Rembaley